

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES
LLC, MONTGOMERY TECHNOLOGIES
LLC, VIRGIL QUANTITATIVE
RESEARCH, LLC, VIRGIL CAPITAL LLC,
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (JGLC)

JOINT STIPULATION

Petitioner Robert A. Musiala, Jr. in his capacity as the Court-appointed receiver (“Receiver”), by and through his attorneys of record, and non-party respondents Nasir Adaya and Phuong Nguyen (“Respondents”) (collectively, the “Parties”), make the below stipulation:

WHEREAS, on August 4, 2023, the Receiver filed a motion to compel the turnover of the Disputed Assets (“Motion”);

WHEREAS, Respondents have sought discovery in advance of opposing the Motion (“Discovery Requests”);

WHEREAS, the Parties have met and conferred to address disputes related to the Discovery Requests and set a schedule by which the Parties will finalize their briefing with respect to the Motion.

NOW THEREFORE, IT IS HEREBY STIPULATED, subject to Court approval and order, and agreed to by and between the Parties, through their respective counsel of record, that:

1. By September 15, 2023, the Parties shall substantially complete all document production related to the Discovery Requests.

2. By October 27, 2023, Respondents shall submit their Opposition to the Receiver's Motion.

3. By November 15, 2023, the Receiver shall submit his Reply in further support of the Motion.

4. Nothing in this Joint Stipulation restricts any Party from filing a discovery motion in the future.

Dated: September 8, 2023
New York, New York

Respectfully submitted,

BAKER & HOSTETLER, LLP

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SO ORDERED:

Hon. Jessica G.L. Clarke

September __, 2023